

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

SIOUX RURAL WATER SYSTEM, INC., a Non-Profit Corporation Plaintiff, vs. CITY OF WATERTOWN, a South Dakota Municipality, and WATERTOWN MUNICIPAL UTILITIES, an agency of the CITY OF WATERTOWN Defendants.	Civ. 15-1023 PLAINTIFF'S UNOPPOSED MOTION TO EXTEND DEADLINES
--	--

Comes now the Plaintiff, pursuant to Federal Rule of Civil Procedure 29, and respectfully submits this Unopposed Motion to Extend Deadlines and moves this Court for an Amended Scheduling Order.

The Court entered its Scheduling Order in this matter on July 23, 2015. Due to availability of Plaintiff's expert witnesses, the parties have agreed to an additional twenty-one (21) days to submit their expert disclosure under Rule 26(a)(2), past the current deadline of January 29, 2016. Therefore, the Plaintiff respectfully submits this Unopposed Motion to Extend Deadlines.

Plaintiff is authorized to state that the Defendants do not object to this motion, as long as all subsequent deadlines are extended accordingly. Plaintiff motions this Court for an Order to extend deadlines as follows:

1. Reports from retained experts under Rule 26(a)(2) shall be due from Plaintiff by **February 19, 2016**, and Defendants by **April 21, 2016**.

2. Supplementations under Rule 26(e) shall be due within in a reasonable time after the party becomes aware of information that should be disclosed under Rule 26(e), which, in any event shall be completed no later than sixty (60) days prior to trial.

3. The Plaintiff has until **May 6, 2016**, to move to join additional parties and to move to amend the pleadings. The Defendants have until **May 6, 2016**, to move to join additional parties and to move to amend the pleadings.

4. All discovery will be completed by **May 23, 2016**.

5. All motions, other than motions in limine, together with supporting briefs, shall be filed and served on or before **August 22, 2016**. Opposing parties shall file and serve answering materials and briefs no later than twenty (20) days thereafter. Reply briefs, if desired, shall be filed and served no later than ten (10) days thereafter.

6. A telephonic pretrial conference shall be held at a time and date set by the Court, and a trial date shall be fixed by the Court after consultation with counsel of record. Counsel will receive written instructions from the Aberdeen chambers regarding the conference bridge telephone number and participant code that will be used for this conference.

Respectfully submitted this ____ day of January, 2016.

/s/ Jeff Cole

Jeff Cole

William D. Sims

ZIMMER, DUNCAN AND COLE, L.L.P.

5000 S. Broadband Lane, Suite 119

Sioux Falls, SD 57108

(605) 361-9840

jcole@zdclaw.com

bill@zdclaw.com

Attorneys for Plaintiff

Sioux Rural Water System